

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:) **20-16936**
)
Ramon M. Santiago,) **Chapter 13**
)
Debtor(s).) **Hon. Judge A. Benjamin Goldgar**

NOTICE OF MOTION

TO: See attached list

On May 14, 2021, at 9:30 a.m., I will appear before the Honorable Judge Goldgar, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **160 817 7512** – the password is **623389**. The meeting ID and further information can also be found on the Judge Goldgar's web page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movant: Ramon M. Santiago
By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100
mcolter@davidmsiegel.com

CERTIFICATE OF SERVICE

I certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on April 8, 2021, before 5:00 p.m.

/s/ Michael R. Colter, II
Michael R. Colter, II

To the following persons or entities who have been served via electronic mail:

Patrick S. Layng, U.S. Bankruptcy Trustee
Glenn Stearns, Chapter 13 Trustee
Codilis & Associates, P.C. bkpleadingsNORTHERN@il.cslegal.com
Kovitz Shifrin Nesbit ndaily@ksnlaw.com
Sherman & Purcell LLP shermlaw13@aol.com

To the following persons or entities who have been served via U.S. Mail:

Ramon M. Santiago
1635 Station Park Drive
Grayslake, IL 60030

City Of Chicago Department of Finance
C/O Arnold Scott Harris P.C.
111 W Jackson Blvd Suite 600
Chicago, IL 60604

Ford Motor Credit Co., LLC
PO Box 62180
Colorado Springs, CO 80962

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Navy Federal Credit Union
PO Box 3000
Merrifield, VA 22119

Discover Personal Loans
PO Box 30954
Salt Lake City, UT 84130

JPMorgan Chase Bank, N.A.
s/b/m/t Chase Bank USA, N.A.
c/o Robertson, Anschutz & Schneid, P.L.
6409 Congress Avenue, Suite 100
Boca Raton, FL 33487

Greensky, LLC
1797 Northeast Expressway Suite 100
Atlanta, GA 30329-3614

Capital One Bank (USA), N.A.
by American InfoSource as agent
4515 N Santa Fe Ave
Oklahoma City, OK 73118

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

AmeriSave Mortgage Corporation
Attn: Mortgage Division
1 Corporate Drive, Suite 360
Lake Zurich, IL 60047

Village Station Homeowner's
Area Association, Inc.
c/o Kovitz Shifrin Nesbit
175 North Archer Avenue
Mundelein, IL 60060

BOKF, N.A.,
7060 S Yale Ave, Ste 200
Tulsa, OK 74136-5721

Citibank, N.A.
5800 S Corporate Pl
Sioux Falls, SD 57108-5027

Portfolio Recovery Associates, LLC
c/o Barclays Bank Delaware
PO Box 41067
Norfolk VA 23541

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MOTION TO SELL REAL ESTATE

NOW COMES the Debtor, Ramon M. Santiago, by and through his attorney, DAVID M. SIEGEL & ASSOC., LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction under 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois.
- 2) On September 11, 2020, Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 USC and Glenn Stearns was appointed Trustee.
- 3) Debtor's Plan was confirmed on January 29, 2021, with monthly payments of \$1,430.00, and general unsecured creditors receiving no less than 51% of their allowed claims.
- 4) Debtor seeks permission to sell his home located at 1635 Station Park Drive, Grayslake, Illinois for the total sum of \$219,105.00, (Exhibit A).
- 5) Debtor seeks permission to sell his residence under § 363(b)(1) for \$219,105.00. The balance owed on the mortgage according to the Seller's Closing Statement is \$200,885.00. The balance of the mortgage when this case was filed was \$200,096.89 per Proof of Claim 14.
- 6) Debtor will forward the closing statement to the Trustee within seven days of closing.
- 7) Debtor will not have surplus funds to forward to Trustee Glenn Stearns.

WHEREFORE, the Debtor, Ramon M. Santiago, prays this Honorable Court enter an Order Granting Debtor's Motion to Sell Real Estate and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675

Attorney for the Debtor(s)
David M. Siegel & Associates, LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-810